

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**INNOVATIVE GLOBAL SYSTEMS,
LLC,
Plaintiff,**

VS.

**VOLVO CONSTRUCTION
EQUIPMENT NORTH AMERICA, INC.,
VOLVO TRUCKS NORTH AMERICA,
INC., KOMATSU AMERICA CORP.,
CATERPILLAR, INC., HYUNDAI
CONSTRUCTION EQUIPMENT
AMERICAS, INC., TOPCON TIERRA,
STARTRAK SYSTEMS, LLC,
WIRELESS MATRIX USA, LLC, JLG
INDUSTRIES INC., TYLER
TECHNOLOGIES, INC., GEOTAB,
INC., and NAVISTAR, INC.,**

Defendants.

No. 6:10cv327 - LED

JURY TRIAL DEMANDED

**DEFENDANT JLG INDUSTRIES, INC.'S AND PLAINTIFF INNOVATIVE GLOBAL
SYSTEMS, LLC'S AGREED MOTION TO EXTEND DEADLINE TO COMPLY WITH
P.R. 3-4(a) AND DISCOVERY ORDER 2**

Defendant JLG Industries, Inc. (“JLG”) and Plaintiff Innovative Global Systems, LLC (“IGS”) file this agreed motion to extend JLG’s deadline to comply with P.R. 3-4(a) and Discovery Order 2(B) [Docket Number 164] and any obligation of IGS to comply with Discovery Order 2(B) and (C) with respect to JLG as follows:

JLG requests that its deadline to comply with P.R. 3-4(a) and Discovery Order 2(B) be extended through and including February 7, 2011. IGS requests that any deadline for it to comply with Discovery Order 2(B) and (C) as to JLG be extended through and including the same date. The purpose of this extension is to determine whether the ongoing negotiations

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regarding a resolution of Plaintiff's claims can be brought to fruition. JLG and IGS agree to the requested relief.

Dated: January 19, 2011

Respectfully submitted,

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JLG INDUSTRIES INC.**

**DEFENDANT JLG INDUSTRIES, INC.'S AND PLAINTIFF INNOVATIVE GLOBAL SYSTEMS, LLC'S
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Dated: January 19, 2011.

Respectfully submitted,

By: /S/ Mark A. Shoffner (by permission for MTC)

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**DEFENDANT JLG INDUSTRIES, INC.'S AND PLAINTIFF INNOVATIVE GLOBAL SYSTEMS, LLC'S
AGREED MOTION TO EXTEND DEADLINE TO COMPLY WITH P.R. 3-4(a) AND DISCOVERY
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this document has been served on all counsel of record via electronic mail through Local Rule CV-5(a) on this 19th day of January, 2011.

/s/ Mark A. Shoffner